

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CONSUMER FINANCIAL)	
PROTECTION BUREAU,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:22-cv-1880
)	
TRANSUNION, TRANS UNION LLC,)	District Judge Elaine E. Bucklo
TRANSUNION INTERACTIVE, INC., and)	
JOHN T. DANAHER,)	
)	
Defendants.)	

**AGREED MOTION
FOR EXTENSION OF TIME AND ENTRY OF BRIEFING SCHEDULE**

Defendants TransUnion, Trans Union LLC, and TransUnion Interactive, Inc. (collectively, “TransUnion”), Defendant John Danaher (“Danaher”), and Plaintiff Consumer Financial Protection Bureau (“Bureau”) respectfully move for an extension of time for TransUnion’s and Danaher’s answers to Plaintiff’s Complaint and for entry of a briefing schedule with respect to any Motion to Strike by Plaintiff concerning the answers. In support of this motion, TransUnion, Danaher, and the Bureau state as follows:

1. On November 18, 2022, the Court entered an Order denying TransUnion’s and Danaher’s Motions to Dismiss. (Dkt. 52.)
2. Pursuant to Fed. R. Civ. P. 12(a)(4)(A), TransUnion’s and Danaher’s answers to Plaintiff’s Complaint are due on December 2, 2022.
3. Counsel for TransUnion, Danaher, and the Bureau have conferred and agree upon the following schedule extending the deadline for TransUnion’s and Danaher’s answers and setting a briefing schedule for any Motion to Strike by Plaintiff concerning the answers:

- TransUnion's and Danaher's Answers: January 31, 2023
- Plaintiff's Motion(s) to Strike: March 17, 2023
- TransUnion's and Danaher's Response(s): 30 days after Plaintiff files a Motion to Strike
- Plaintiff's Repl(ies) in Support: 14 days after filing of TransUnion's and Danaher's Response(s) to Motion to Strike

4. Counsel for TransUnion, Danaher, and the Bureau do not seek an enlargement of the dates established by the Court in its November 18, 2022 Order (Dkt. 51) for the submission of the parties' joint planning report. All counsel further agree that discovery can commence and should not be stayed based on the extension of the deadline for filing the answers or the extension of the deadline for the filing of any Motion to Strike.

5. Granting this agreed request for an extension of time and entry of briefing schedule will neither prejudice any party nor unreasonably delay this litigation.

WHEREFORE, for the reasons stated herein, TransUnion, Danaher, and the Bureau respectfully request that the Court grant this motion and enter an Order extending the deadline to answer Plaintiff's Complaint to January 31, 2023 and setting the above-requested briefing schedule for any Motion to Strike by Plaintiff concerning the answers.

Dated: December 1, 2022

Respectfully submitted,

By: /s/ Valerie L. Hletko

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CERTIFICATE OF SERVICE

I, Valerie L. Hletko, an attorney, hereby certify that on December 1, 2022, I caused a copy of the foregoing **Agreed Motion for Extension of Time and Entry of Briefing Schedule** to be served upon all counsel of record via the Court's electronic filing system, in accordance with Local Rule 5.9.

By: /s/ Valerie L. Hletko